

1 THE HONORABLE RICHARD A. JONES

2  
3  
4  
5  
6 UNITED STATES DISTRICT COURT  
7 WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 Aleksandr Dmitrievich Kirilichev,

10 Petitioner,

11 v.

12 Albatros Ltd.,

13 Respondent.

Case No. 2:16-cv-00978-RAJ

DECLARATION OF TODD M. HINNEN IN  
SUPPORT OF PETITIONER'S EX PARTE  
MOTION TO ALLOW SERVICE BY MAIL

14  
15 1. I am an attorney admitted to practice before this Court and a member of the firm  
16 Perkins Coie LLP, counsel for Petitioner Aleksandr Dmitrievich Kirilichev in this proceeding. I  
17 submit this declaration in support of Petitioner's Ex Parte Motion to Allow Service by Mail. I am  
18 fully familiar with the facts set forth herein, which are made based on personal knowledge and/or  
19 the documents referenced below.

20 2. Attached to this Declaration as **Exhibit A** is a true and correct copy of a screenshot  
21 taken at my direction from the publicly available website for the Washington Secretary of State,  
22 [http://www.sos.wa.gov/corps/search\\_detail.aspx?ubi=602934262](http://www.sos.wa.gov/corps/search_detail.aspx?ubi=602934262), on August 18, 2016.

23 3. Attached to this Declaration as **Exhibit B** is a true and correct copy of the most  
24 recent annual report for Albatros Ltd. ordered at my direction from the Washington Secretary of  
25 State on April 4, 2016, and received on April 5, 2016.

26  
DECLARATION OF TODD M. HINNEN IN SUPPORT  
OF MOTION TO SERVE BY MAIL – 1

132575115.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1 I declare under penalty of perjury under the laws of the State of Washington and the laws  
2 of the United States of America that the foregoing is true and correct.

3 DATED this 1st day of September, 2016 in Seattle, Washington.

4  
5 /s/ Todd M. Hinnen

6 Todd M. Hinnen WSBA #27176

7 **Perkins Coie LLP**

8 1201 Third Avenue, Suite 4900

9 Seattle, WA 98101-3099

10 Telephone: 206.359.8000

11 Facsimile: 206.359.9000

12 Email: THinnen@perkinscoie.com

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 1, 2016 I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system and that I have mailed by United States Postal  
4 Service Certified Mail the document to the following entities:

5 Albatros Ltd.  
6 C/O Gueorgui Halatchev-Halberg  
7 533 157th Ave SE  
8 Bellevue, WA 98008

9 Albatros Ltd.  
10 C/O Gueorgui Halatchev-Halberg  
11 3046 177th Ave NE  
12 Redmond WA 98052

13 I certify under penalty of perjury that the foregoing is true and correct.

14 Dated: September 1, 2016

15 By: s/ Todd M. Hinnen  
16 Todd M. Hinnen #27176  
17 **Perkins Coie LLP**  
18 1201 Third Avenue, Suite 4900  
19 Seattle, WA 98101-3099  
20 Telephone: 206.359.8000  
21 Facsimile: 206.359.9000  
22 Email: THinnen@perkinscoie.com  
23 Attorneys for Aleksandr Dmitrievich Kirilichev  
24  
25  
26

DECLARATION OF TODD M. HINNEN IN SUPPORT  
OF MOTION TO SERVE BY MAIL– 3

**EXHIBIT A**  
**to Hinnen Declaration**

**ALBATROS LTD**

UBI Number	602934262
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Inactive
State Of Incorporation	WA
WA Filing Date	06/22/2009
Expiration Date	06/30/2015
Inactive Date	10/01/2015
Duration	Perpetual
Registered Agent Information	
Agent Name	JAMES PETERSON
Address	15600 NE 8TH ST #K112
City	BELLEVUE
State	WA
ZIP	98008
Special Address Information	
Address	
City	
State	
Zip	

**Governing Persons**

Title	Name	Address
President	HALATCHEV-HALBERG , GEORGE	BELLEVUE , WA

**EXHIBIT B**  
**to Hinnen Declaration**



Renewal Agent for Secretary of State  
State of Washington  
Business Licensing Service



# Profit Corporation Renewal & Annual Report

To dissolve this corporation, obtain the form at [www.sos.wa.gov/corps](http://www.sos.wa.gov/corps)

Name, Registered Agent, and Registered Office Address

FOR VALIDATION ONLY

03N-400-925-0003

1419-W

Unified Business ID No 602 934 262

State of Incorporation WA

Date of WA Inc./Auth. 06-22-2009

Expiration Date\* 06-30-2014

ALBATROS LTD  
C/O GUEORGUI HALATCHEV-HALBERG  
3046 177TH AVE NE  
REDMOND WA 98052

☒ Important! If the registered agent/office/mailling information is incorrect, mark the box and complete the reverse side of this form. If the address is incorrect, mailings may not be delivered and could result in the dissolution of your company.

RENEWAL SECTION \*After renewal your new expiration date will be:

06-30-2015

RENEW ONLINE! Go to: [CorpRenewal.wa.gov](http://CorpRenewal.wa.gov)

Password: K793 77B9

Domestic Profit Corporation  
Renewal Application Fee

\$ 60.00  
11.00

Failure to return completed form and pay fees by the expiration date will result in \$25.00 late fee and may lead to the dissolution of your corporation.

Make check payable to DEPARTMENT OF REVENUE  
in U.S. FUNDS only

TOTAL FEES DUE: \$71.00

FEES & REPORT  
REQUESTED BY 06-16-2014

## ANNUAL REPORT SECTION - REQUIRED

Does your company own land, buildings, or other real property in Washington? ☐ Yes ☒ No (See "Controlling Interest" on back)

Contact phone (206) 412-8546 Contact email [georgegith@yahoo.com](mailto:georgegith@yahoo.com)  
(This email may be used for future electronic renewal notices)

Briefly describe the nature of your business TRADE SERVICE

Address of principal place of business 533-157TH AVE SE, BELLEVUE, WA 98008  
ADDRESS CITY STATE ZIP

If incorporated outside Washington,  
list the corporate office address

ADDRESS CITY STATE ZIP

List names and addresses of all corporate officers and all directors in your company. (If necessary, attach additional sheets in the same format Include your UBI number on each page)

GEORGE HALATCHEV-HALBERG BELLEVUE WA 98008  
PRESIDENT'S NAME HOME OR BUSINESS ADDRESS CITY STATE ZIP

VICE PRESIDENT'S NAME HOME OR BUSINESS ADDRESS CITY STATE ZIP

SECRETARY'S NAME HOME OR BUSINESS ADDRESS CITY STATE ZIP

TREASURER'S NAME HOME OR BUSINESS ADDRESS CITY STATE ZIP

CHAIR, BOARD OF DIRECTORS NAME HOME OR BUSINESS ADDRESS CITY STATE ZIP

If you have "no directors", state who performs the duties normally assumed by corporate directors

X Halberg

THIS DOCUMENT IS HEREBY EXECUTED UNDER PENALTIES OF PERJURY,  
AND IS, TO THE BEST OF MY KNOWLEDGE, TRUE AND CORRECT

GEORGE HALBERG - PRES  
PRINT NAME & TITLE (OFFICER / CHAIR)

602 934 262

05-06-14  
DATE SIGNED

Telephone 1-800-451-7985

Please return to: STATE OF WASHINGTON  
BUSINESS LICENSING SERVICE  
PO BOX 34456  
SEATTLE WA 98124-1456

**PROFIT CORPORATION STATEMENT OF CHANGE OF  
REGISTERED AGENT OR REGISTERED OFFICE ADDRESS**  
RCW 23B

1. NEW REGISTERED AGENT'S CONSENT. The Registered Agent must be a resident of, or a corporation registered in, Washington State.

Name of new (*successor*) Registered Agent (*please print*): \_\_\_\_\_

I hereby consent to serve as Registered Agent. As such, I will accept and forward Service of Process and all mail to the corporation. In the event of my resignation, or any change in the Registered Office address, I will notify the Secretary of State immediately.

**X** \_\_\_\_\_

SIGNATURE OF AGENT NAMED ABOVE

TITLE

DATE SIGNED

If you are signing as the authorized representative of a corporation, you must give your title.

2. The registered office street address is required. It must be identical to the **business** address of the Registered Agent and must be located in the state of Washington. A Post Office Box may be used for mailing purposes only.

New Registered Address: \_\_\_\_\_ **WA** \_\_\_\_\_  
REQUIRED: STREET & NUMBER OR RURAL ROUTE CITY ZIP

PO Box for Mailing: \_\_\_\_\_ **WA** \_\_\_\_\_  
OPTIONAL: POST OFFICE BOX NUMBER CITY ZIP

**CONTROLLING INTEREST**

"Real property" means land or anything affixed to land, including standing timber or crops.

Examples: Buildings, condominiums, used park model trailers, used floating homes, underground irrigation systems or utilities and other types of equipment that are permanently affixed to the land.

See WAC 458-61a-102 for additional information.

Answer the following questions **only** if you answered "yes" to the question about owning land, buildings, or other real property in Washington on the front of this form:

**A controlling interest transfer is when 50% or more of the ownership in an entity changes hands as defined under RCW 82.45.010(2).**

1. Has there been a transfer of stock, other financial interest change, or an option agreement exercised during the last 12 months that resulted in a transfer of controlling interest? ☐ Yes ☐ No
2. Has an option agreement been executed in the last 12 months allowing for the future purchase or acquisition of the entity, that, if exercised would result in a transfer of controlling interest? ☐ Yes ☐ No

You must contact the Washington State Department of Revenue to report a Controlling Interest Transfer **IF**:

- This company owns land, buildings, or other real estate in Washington State,
- AND**
- You answered "YES" to question 1 above.

Failure to report a Controlling Interest Transfer is subject to the penalty provisions of RCW 82.45.220.

**For more information on Controlling Interest, please call the Department of Revenue at (360) 570-3265 or visit their website at [www.dor.wa.gov](http://www.dor.wa.gov)**